



**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

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Order Instituting Rulemaking to consider policy and implementation refinements to the Energy Storage Procurement Framework and Design Program (D.13-10-040, D.14-10-045) and related Action Plan of the California Energy Storage Roadmap.

Rulemaking 15-03-011  
(Filed March 26, 2015)

**REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)**  
**ON ADMINISTRATIVE LAW JUDGE'S RULING REQUESTING COMMENT ON**  
**WHETHER A NEW GENERAL ORDER IS NEEDED TO ESTABLISH A**  
**PRELIMINARY COMMISSION INSPECTION CHECKLIST FOR**  
**ENERGY STORAGE FACILITIES**

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Dated: **November 7, 2016**

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STATE OF CALIFORNIA**

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Pursuant to the Ruling issued by Administrative Law Judge Cooke on September 30, 2016 (ALJ Ruling), Southern California Edison Company (SCE) respectfully provides its reply to comments on whether a new General Order (GO) is needed to establish a preliminary Commission Inspection Checklist for energy storage facilities. SCE’s brief reply responds to Pacific Gas and Electric Company’s (PG&E’s) comments.<sup>1</sup> PG&E stated that it did not see a need for a new or amended GO to implement the Safety and Enforcement Division’s (SED’s) safety inspection checklist. However, PG&E requested that the Commission modify the safety inspection checklist to apply to “all grid-connected storage facilities used to help maintain utility service reliability,” not just utility-owned energy storage facilities.<sup>2</sup>

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<sup>1</sup> Comments of Pacific Gas and Electric Company (U 39 E) on the Need for a New General Order (October 24, 2016).

<sup>2</sup> *Id.* at 1-2.

Although SCE appreciates PG&E's desire to establish a level playing field for all energy storage facilities – *i.e.*, those owned by the investor-owned utilities and those owned and operated by third parties – it is unclear from a jurisdictional standpoint how to reconcile PG&E's proposal. It is not clear what jurisdictional mechanism PG&E is proposing that the Commission use to require unregulated third parties to submit to inspections of their energy storage facilities. It is also unclear whether PG&E is proposing that customers who own energy storage facilities submit to inspections of those facilities installed in their homes or at their businesses.

As SCE stated in its opening comments, if the checklist expands in its scope in the future beyond utility-owned facilities (such as third party owned and operated energy storage systems with which the utility contracts for generation services), revisions to applicable laws and/or GOs may be necessary. In that event, the Commission should specify which additional energy storage facilities would be subject to SED's inspection checklist, and what jurisdictional vehicle (*e.g.*, GO, tariff, etc.) the Commission intends to utilize to inspect those facilities. SCE recommends the Commission then provide parties the opportunity to provide further comments. As such, the Commission should reject PG&E's proposal at this time.

Respectfully submitted,

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